

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS; STATE OF
LOUISIANA,

Plaintiffs,

v.

The UNITED STATES OF AMERICA, et al.;

Defendants.

Civ. Action No. 6:21-cv-00016

STIPULATION AND [PROPOSED] ORDER

The parties in the above-captioned matter stipulate to the following scheduling order:

- 1) Plaintiffs shall file their amended complaint, and accompanying motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than October 22, 2021.
- 2) Defendants shall serve the full certified Administrative Record on Plaintiffs no later than November 4, 2021.
- 3) Defendants shall file their opposition to Plaintiffs' motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than November 12, 2021.

- 4) Plaintiffs shall file their reply memorandum to their motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than November 19, 2021.
- 5) Defendants' shall answer or otherwise respond to Plaintiffs' complaint or amended complaint no later than January 27, 2021.¹
- 6) The parties may agree to alter any of the above deadlines by agreement. To the extent any of the above deadlines are adjusted by agreement, one of the parties shall file a notice with the Court informing it of the changed deadline.

It is SO ORDERED.

October __, 2021

Drew B. Tipton
United States District Judge

¹ Plaintiffs stipulate to this responsive pleading deadline insofar as it would not have collateral consequences for issues like the availability of discovery or consolidation under Rule 65. Plaintiffs preserve their position that, in the event such issues arise, any delay in filing a responsive pleading should not prejudice the resolution of those issues.

Date: October 19, 2021

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

JUDD E. STONE II
Solicitor General

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Attorney-in-Charge
Texas Bar No. 00798537
Southern District of Texas Bar No. 1829509
patrick.sweeten@oag.texas.gov

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Texas Bar No. 24088531
Southern District of Texas Bar No. 3053077
will.thompson@oag.texas.gov

RYAN D. WALTERS
Special Counsel
Texas Bar No. 24105085
Southern District of Texas Bar No. 3369185
ryan.walters@oag.texas.gov

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410

COUNSEL FOR PLAINTIFF STATE OF TEXAS

JEFF LANDRY
LOUISIANA ATTORNEY GENERAL

/s/ Elizabeth B. Murrill
ELIZABETH B. MURRILL
Solicitor General
JOSEPH S. ST. JOHN
Deputy Solicitor General

Louisiana Department of Justice
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766
murrille@ag.louisiana.gov
stjohnj@ag.louisiana.gov

COUNSEL FOR PLAINTIFF STATE OF LOUISIANA

BRIAN M. BOYNTON
Acting Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Adam D. Kirschner
ADAM D. KIRSCHNER
Attorney-in-charge
IL Bar. No. 6286601
Senior Trial Counsel
BRIAN C. ROSEN-SHAUD
ME Bar No. 006018
MICHAEL F. KNAPP
CA Bar No. 314104
KUNTAL CHOLERA
DC Bar No. 1031523
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
Tel: (202) 353-9265
Fax: (202) 616-8460
Email: Adam.Kirschner@usdoj.gov
Brian.C.Rosen-Shaud@usdoj.gov
Michael.F.Knapp@usdoj.gov
Kuntal.Cholera@usdoj.gov

Mailing Address:
Post Office Box 883
Washington, D.C. 20044

Courier Address
1100 L Street NW, Room 11020
Washington, D.C. 20005

EREZ REUVENI
CA Bar No. 264124
Assistant Director
U.S. Department of Justice
Civil Division, Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
202-307-4293 (telephone)
Email: Erez.R.Reuveni@usdoj.gov

Counsel for Defendants

DANIEL DAVID HU
Assistant United States Attorney
Chief, Civil Division
State Bar No. 10131415
S.D. I.D. 7959
Southern District of Texas
1000 Louisiana, Suite 2300 Houston, TX 77002
Tel: (713) 567-9000
Fax: (713) 718-3300
Daniel.Hu@usdoj.gov

Local Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 19, 2021, which automatically serves all counsel of record who are registered to receive notices in this case.

/s/ Adam D. Kirschner
ADAM D. KIRSCHNER